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**hci usa distribution companies, inc.**

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**HCI USA Distribution Companies Incorporated**  
**56 Cape Cod**  
**Irvine, California 92620**

June 18, 1999

Office of Hazardous Materials Exemptions and Approvals  
U.S. Department of Transportation  
400 7<sup>th</sup> Street, SW  
Washington, D.C. 20590-0001  
Attention: **R. Ryan Posten** - Exemptions Program Officer

Subject: Relief from **49 CFR 177.834(h)**

Dear **R. Ryan Posten**:

HCI USA Distribution Companies, Incorporated is an advanced distribution company serving customer's worldwide products, chemicals and advanced materials. The company ranks among the top **10** chemical distribution firms in North America. **hci** USA Distribution Companies has approximately **1,000** employees at more than **50** facilities in **21** states and Mexico. Additional information on **hci** USA Distribution Companies may be found at its Web Page: [www.hollandchemical.com](http://www.hollandchemical.com)

It is a worldwide policy of **hci** USA Distribution Companies to design, blend and distribute its products and to handle materials throughout their life cycle in a manner that protects the environment and safeguards employees, customers and the public from unacceptable risk. This facility participates in the Responsible Distribution Process program of the National Association of Chemical Distributors. The Community Outreach and Emergency Response Plan

of Responsible Distribution brings chemical distribution plants and local communities together through communications and cooperative emergency planning. It is also company policy to adhere to all applicable Federal, State and Local regulations.

The hci Safety Program is designed to prevent fires, explosions and accidental chemical releases. This program requires safety audits, inspection and maintenance programs, and safety training for employees and contract workers. Facilities are encouraged to listen to the concerns of the community and to consider these concerns when designing and implementing process safety systems.

hci USA Distribution Company maintains Health, Safety and Environmental manuals, which contain company policies for Risk Management, Training, Product Stewardship, Community Outreach and Hazard Communication among others. The manuals also include Emergency Action and Emergency Response Plans.

All facilities continue to improve their safety records by conducting incident investigations, safety compliance audits, continuous training of emergency procedures, and continuous community outreach actions which include: educating and training neighbors, customers, fire departments and emergency response teams. hci USA Distribution Companies also practices continuous training of emergency procedures through regular safety meetings and all incidents are thoroughly investigated and reviewed.

In addressing the relief from **49 CFR 177.834(h)**, we are responding via this one letter for all of our facilities. This should make your job easier, as you will have less to review. It also allows both of us to address possible future activities by some facilities. That is to say, one of our locations may be doing an activity in a unique way at this time. However, if customers request it in other locations, another facility may soon conduct that same activity.

We will address your questions in order and will **re-print** the question, allowing this to be a stand-alone document.

1. What is the maximum number of IBCs that are transported on one vehicle at any one time?

This varies with weight limits and customer routes but can be from 6 to 15.

2. Are IBCs mixed with other types of hazardous materials packages on the vehicle?

Nearly always, the exception would be only IBCs by themselves.

3. How are the IBCs secured to the motor vehicle? Please provide drawings or photographs.

The IBCs are secured with straps or chains. The straps go over the top of the IBCs. The chains go through the skids.

4. Are the IBCs routinely removed from the motor vehicle? (What duration?)

IBC's are removed in about half the cases at the customer site. The duration can be weeks or just until next trip. At that time the driver delivers full IBCs and pick up empties.

5. What products do you ship and unload from the IBC under the terms of exemption?

Acids: Sulfuric, Phosphoric, Hydrochloric, Corrosive Liquids, n.o.s.

Bases: Sodium Bi-sulfite, Bleach (Sodium hypochlorite), Aqua Ammonia

Glycols: Ethylene, propylene

Corrosive Liquids, n.o.s.

6. What is the total quantity of hazardous material on one vehicle?

Normal loads are full of various materials depending on customers and routes. The totals appear to be 48,000 to 50,000 pounds.

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7. What is the maximum quantity of hazardous material delivered to a customer during one delivery?

Normal loads are full of various materials depending on customers and routes. The totals appear to be 48,000 to 50,000 pounds.

8. What is the maximum quantity of one hazardous material delivered to a customer during one delivery?

We estimate 5 - 6 IBCs from 330 gallons up to 450 gallons, 10,000 pounds .

9. Do deliveries contain materials that would create an unsafe condition, such as an explosion, fire excessive increase in pressure or heat, or the release of toxic vapors, as a result of any mixture of the materials?

This is possible, but unlikely, loads basically depend on customer orders and routes.

10. Are the IBCs unloaded under pressure? If so, what material is used to pressurize the IBC?

Generally, we would use gravity or a pump. However, we would like to be able to use nitrogen to off load sulfuric acid, hydrochloric acid, and ammonia solutions (Class 8).

11. What is the maximum length of discharge hose and how is the hose purged after delivery to the customer?

Usually one joint, 15 to 20 feet depending on how close the truck can park to hook-up stations.

Either blowing lines with nitrogen, or pumping until dry then catching any drips from hoses using 5-gallon buckets would purge hoses.

12. How many discharge hoses are on one vehicle?

Depends on the products, 4 at most.

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13. How many shipments are made per month under the terms of the exemption?

It ranges from 15 to 100 per month as a total for all of our locations.

14. How many deliveries are made during one shipment?

Depends on routing, but usually 1 per shipment but it can be up to 5.

We would like to point out that it is impractical to expect a loaded IBC to be taken off the trailer to be unloaded. This is unnecessary and can be unsafe. Many places, such as oil field wells, do not have forklifts or are unsafe for forklift usage due to the unpaved surface.

All written and verbal communications are to be addressed to and by our representative:

Designated Individual:

**Andrew E. Cuthbert**  
**HCI USA Distribution Companies, Inc.**  
**56 Cape Cod**  
**Irvine, CA 92620-2711**

**(949) 559-0200 Fax (949) 559-0205**

Sincerely,

A handwritten signature in black ink, appearing to read 'A. E. Cuthbert', with a stylized flourish at the end.

Andrew E. Cuthbert  
Assistant Corporate Environmental Manager

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